

ENTERED

February 22, 2022

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
KELLEY HYDRAULICS, INC.,)	
)	Case No. 21-33269
Debtor.)	
)	

**STIPULATION AND AGREED ORDER REGARDING THE BALLOT AND
OBJECTION DEADLINES FOR NLCG PRIVATE LENDING FUND, LLC**

(Related to Docket No. 48)

This stipulation and agreed order (“Stipulation and Agreed Order”) regarding the ballot and objection deadlines contained in this Court’s *Order to (I) Establish Plan Related Deadlines and (II) Set Confirmation Hearing (Re: Docket No. 32)* [Dkt. No. 48] (“Order”) is by and between Kelley Hydraulics, Inc. (the “Debtor”) and NLCG Private Lending Fund, LLC (“NLCG,” and with the Debtor, the “Parties”). The Parties hereby stipulate and agree as follows:

RECITALS

WHEREAS, on January 3, 2022, the Debtor filed its *Subchapter V Plan of Reorganization of Kelley Hydraulics, Inc. Dated January 3, 2022* [Dkt. No. 32] (the “Proposed Plan”) providing for certain treatment of the secured debt owed to NLCG;

WHEREAS, on January 25, 2022, the Court entered its Order establishing February 25, 2022 at 12:00 noon Central Time (CT) as the Ballot Deadline and Objection Deadline, as further defined therein;

WHEREAS, the Parties are engaged in good faith discussions and negotiations regarding certain terms and provisions of the Proposed Plan, including but not limited to the drafting and revision of the forbearance agreement that is referenced in the Proposed Plan;


WHEREAS, in the furtherance of a consensual plan confirmation process, the Parties have reached an agreement to extend the Ballot Deadline and Objection Deadline for NLCG only;

NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND ORDERED AS FOLLOWS:

1. The Ballot Deadline and Objection Deadline, as defined in this Court's prior Order, for NLCG is March 4, 2022, at 5:00 pm Central Time (CT).

IT IS SO ORDERED.

Signed: February 22, 2022



Marvin Isgur
United States Bankruptcy Judge

AGREED AND ACCEPTED:

**HUGHES, WATTERS & ASKANASE,
LLP**

/s/ Alexander Perez
Alexander Perez
aperez@hwa.com
State Bar No. 24041076
1201 Louisiana, Suite 2800
Houston, TX 77002
Telephone: 713-759-0818
Facsimile: 713-759-6834

**ATTORNEYS FOR NLCG PRIVATE
LENDING FUND, LLC**

**WEYCER, KAPLAN, PULASKI & ZUBER,
P.C.**

/s/ Jeff Carruth*
Jeff Carruth
jcarruth@wkpz.com
State Bar No. 24001846
3030 Matlock Rd., Suite 201
Arlington, TX 76015
Telephone: 713-341-1158
Facsimile: 866-666-5322

ATTORNEYS FOR THE DEBTOR
*Signed with permission /s/ Alexander Perez

United States Bankruptcy Court
Southern District of Texas

In re:
Kelley Hydraulics, Inc.
Debtor

Case No. 21-33269-mi
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4
Date Rcvd: Feb 22, 2022

User: ADIuser
Form ID: pdf002

Page 1 of 2
Total Noticed: 2

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Feb 24, 2022:

Recip ID	Recipient Name and Address
db	+ Kelley Hydraulics, Inc., 17933 FM 362, Waller, TX 77484-9397
aty	+ Next Level Capital Solutions, LLC, c/o Alexander Perez, Hughes Watters Askanase, 1201 Louisiana, 28th Fl, Houston, TX 77002 UNITED STATES 77002-5607

TOTAL: 2

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
cr		WALLER COUNTY, et al

TOTAL: 1 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Feb 24, 2022

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 22, 2022 at the address(es) listed below:

Name	Email Address
Alexander Rafael Perez	on behalf of Attorney Next Level Capital Solutions LLC APerez@hwallp.com, dkokenes@hwallp.com
Drew McManigle	drew@MaccoRestructuringGroup.com kathy@macco.group;TX86@ecfbis.com
Ha Minh Nguyen	on behalf of U.S. Trustee US Trustee ha.nguyen@usdoj.gov
Jeffery Dayne Carruth	on behalf of Debtor Kelley Hydraulics Inc. jcarruth@wkpz.com,

District/off: 0541-4

User: ADIuser

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Date Rcvd: Feb 22, 2022

Form ID: pdf002

Total Noticed: 2

jcarruth@aol.com;atty_carruth@trustesolutions.com;carruthjr87698@notify.bestcase.com

Owen Mark Sonik

on behalf of Creditor WALLER COUNTY et al osonik@pbfc.com, osonik@ecf.inforuptcy.com;mvaldez@pbfc.com

US Trustee

USTPRegion07.HU.ECF@USDOJ.GOV

TOTAL: 6